

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ROCK HILL DIVISION

Boots Smith Oilfield Services, LLC,)	Civil Action No. 0:11-cv-02166-JFA
)	
Plaintiffs,)	
)	
vs.)	<u>ANSWER TO LOCAL RULE 26.01</u>
)	<u>INTERROGATORIES</u>
Patriot Energy Group and Universal Ensco,)	
Inc.,)	
)	
Defendants.)	
_____)	

Defendant Universal Ensco, Inc. ("Universal Ensco") hereby submits its Answer to Local Rule 26.01 Interrogatories as follows:

A. State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: None known at this time.

B. As to each claim, state whether it should be tried jury or non-jury and why.

RESPONSE: The case should be tried by jury. Plaintiff requested a jury trial.

C. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: Universal Ensco is not a publicly traded company, no publicly owned company owns ten percent or more of Universal Ensco, and Universal Ensco does not own ten percent or more of any publicly owned company.

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: Universal Ensco does not challenge the division in which this case was filed.

E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transaction, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: Undersigned counsel is not aware of any related action.

F. If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: Universal Ensco is properly identified.

G. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE: None known at this time.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: /s Erik T. Norton

Howard A. VanDine, III, Fed. No. 1046

E-Mail: howard.vandine@nelsonmullins.com

Erik T. Norton, Fed. No. 09683

E-Mail: erik.norton@nelsonmullins.com

1320 Main Street / 17th Floor

Columbia, SC 29201

(803) 799-2000

Attorneys for Universal Ensco, Inc.

Columbia, South Carolina
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